

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Christian Lee PATINO, Raymond BERRONES II,  
Dante Junius VELA

Case No.

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 4, 2025 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*Title 18 United States Code,  
Section 933

Trafficking in firearms.

This criminal complaint is based on these facts:

See Attached Sheet...

☒ Continued on the attached sheet./s/ Miguel A. Rodriguez*Complainant's signature*Miguel A. Rodriguez, ATF Task Force Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: \_\_\_\_\_

*Judge's signature*City and state: Laredo, Texas, U.S. Magistrate Judge*Printed name and title*

Attachment A

1. On February 4, 2025, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) received information that an individual identified as Christian Lee PATINO had attempted to purchase a firearm from a local Federal Firearms Licensee (FFL) dealer. A witness was suspicious of the purchase because during the purchase, PATINO was accompanied by an unidentified male who remained outside of the FFL while PATINO purchased at least two firearms.
2. The witness reported the incident to ATF agents after noticing PATINO and the unidentified male had initially visited the FFL location and later returned to purchase two AR-type rifles using small denominations of U.S. currency.
3. Shortly after receiving the information, ATF agents and Laredo Police found the vehicle PATINO was using and set up surveillance. While conducting surveillance, ATF agents discovered PATINO was suspected of being involved in firearms trafficking and straw purchasing of firearms. A query of PATINO revealed that several firearms which he had previously purchased were recovered in Mexico.
4. ATF agents also observed PATINO exit the FFL alone holding what appeared to be two AR-type rifles. PATINO placed the rifles in the back seat of a red sedan and then entered the vehicle.
5. Mobile surveillance team maintained visual of the red sedan until an officer assigned to the Laredo Police Department (LPD) observed a moving traffic violation and conducted a vehicle stop at the intersection of Iturbide Street and San Leonardo Avenue in Laredo, Texas.
6. During vehicle stop, the driver of the red sedan was identified as Raymond BERRONES II. Additionally, a third male was discovered riding in the vehicle sitting in the rear passenger seat next to the firearms. The male in the back seat was identified as Dante Junius VELA. ATF agents received consent to search the vehicle from BERRONES and discovered the two rifles which PATINO had just purchased wrapped in a blanket and stuffed into a duffel bag. The rifles were identified as a DPMS Panther Arms, Model A-15, multi-caliber, rifle, bearing serial number FFH280599, and a DPMS Panther Arms, Model A-15, multi-caliber, rifle, bearing serial number DKF400027.
7. Law enforcement database queries revealed BERRONES and VELA had extensive criminal histories including felony and misdemeanor convictions which prohibited them from possessing firearms and/or ammunition.
8. Based on the totality of the circumstances, PATINO, BERRONES, and VELA were detained by ATF agents for suspicion of firearms trafficking. PATINO, BERRONES, and VELA were transported to the ATF Laredo Field Office for further questioning.

9. Agents conducted an interview of BERRONES. During the interview, BERRONES admitted to agreeing to transport PATINO to purchase the firearms knowing that PATINO was purchasing the firearms for an unidentified individual. BERRONES also told agents that he believed the firearms were most likely going to Mexico.
10. Agents conducted an interview of PATINO who admitted that he received money to purchase the firearms for an unidentified individual and was being paid to make the purchase. PATINO further admitted to hiring BERRONES to drive him to make the purchase and deliver the firearms to the unidentified individual. PATINO also admitted to hiring VELA to provide security during the purchase and delivery of the firearms.
11. Agents also conducted an interview of VELA who admitted to getting in the car and moving the firearms when he entered the vehicle.
12. ATF agents performed a preliminary examination of the firearm and found that it affected interstate commerce.